

## Toxic Substance Plan Summary and Certification

<b>Company Name:</b>	Indalco	<b>Parent Company:</b>	Lincoln Electric Company of Canada LP
<b>Address:</b>	939 Gana Court, Mississauga	<b>Address:</b>	179 Wickstead Avenue Toronto
<b>Number of Employees</b>	0000005733	<b>UTM Spatial Coordinates</b>	43.66580 -79.68840
<b>NAICS Code</b>	331317	<b>NPRI ID #</b>	0000005733
		<b>Ontario MOE ID #</b>	NA
<b>Facility Public Contact Position</b>	Gladwyn Issac EHS Leader	<b>Email</b>	<a href="mailto:gladwyn_issac@Lincolnelectric.com">gladwyn_issac@Lincolnelectric.com</a>
<b>Phone #:</b>	(905) 3641584		
<b>Toxic Substances</b>	<b>CAS#</b>		
Manganese	7439-96-5		
PM10			
PM2.5			

### Toxic Reduction Policy Statement of Intent

Manganese (a Phase 1 toxic substance) is currently used by Indalco in the aluminum welding wire production process. Indalco intends to reduce the use of this toxic substance at the facility where possible. This facility does not create Manganese; therefore, this plan will not address reducing its creation.

Indalco also created and released 9.25 tonnes of Particulate Matter (PM) 10 Microns and 7.59 tonnes of PM 2.5 in 2012. Particulate matter is created primarily during the aluminum melting operations; however, some particulate matter is also generated through the operation of ancillary sources such as cooling towers and natural gas combustion processes.

## Reduction Objectives

Indalco prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. Indalco will strive to reduce the use of the Phase 1 toxic substance Manganese. This plan will determine the technical and economic feasibility of each option identified to determine which, if any, are viable for implementation at this time.

Additionally, this plan will examine options for the reduction of Particulate Matter created at the Site and the technical and economic feasibility of these options will also be examined to determine if any are viable for implementation.

## Description of Substances

Manganese is used at the facility as an alloying component in the production of aluminum welding wire and rod. Indalco used 10.6 Tons of Manganese in the 2012 Calendar year. Manganese is a Phase 1 substance,; however, 2012 was the first year in which the threshold of 10 tons was exceeded for Manganese. As such, a reduction plan for Manganese was not done previously.

Particulate matter is created during the foundry, cooling water and natural gas combustion processes located in the facility

## Toxic Substance Reduction Option to be Implemented

Indalco has reviewed numerous options to reduce the use of Manganese as well as reduce the creation of PM 10 and PM 2.5. After completing both a technical feasibility assessment and an economic feasibility assessment, Indalco has found one reduction option that is to be implemented. This option will reduce the use of Manganese at the facility as well as reduce the creation of PM10 and PM2.5.

## Plan Summary Statement

Indalco has completed a Toxic Substance Reduction Plan for their facility and this plan has examined various options for the reduction in the use of manganese as well as the creation of PM10 and PM2.5 at the facility.

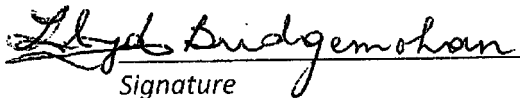
Of the six (6) options developed and assessed in the plan, only one (**Option 4**) was determined to be technically feasible. Subsequent to the technical feasibility, Option 4 was also assessed to be economically feasible. The implementation of this option will result in a reduction in the use and creation of the three toxic substances as outlined in the Table below.

### Certification by Highest Ranking Employee

As of December 28, 2013, I, Lloyd Bridgemohan, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

#### Toxic Substances:

Manganese  
PM10  
PM2.5

 December 28, 2013  
Signature

### Certification by Licensed Planner

As of December 28, 2013, I, Stewart McLellan certify that I am familiar with the processes at Solo Cup that use or create the toxic substances referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the toxic substance reduction plans referred to below for the toxic substances and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

#### Toxic Substances:

Manganese – Plan Dated December 28<sup>th</sup>, 2013  
PM10– Plan Dated December 28<sup>th</sup>, 2013  
PM2.5– Plan Dated December 28<sup>th</sup>, 2013



December 28, 2013

Stewart McLellan, C.E.T  
Toxic Substance Reduction Planner, TRSP0257  
Cardinal Environmental Consulting Services Ltd.